

FINAL ENVIRONMENTAL IMPACT REPORT INFORMATION FOR THE READER

This document consists of the Final Environmental Impact Report (FEIR) for the proposed Valiano Project (“Project” or “Proposed Project”). The EIR text is preceded by the List of Persons, Organizations, and Public Agencies that Commented on the Draft EIR (DEIR) dated April 2015 and Recirculated DEIR (RDEIR) dated December 2016; Comments and Responses on the DEIR and RDEIR; and the Statement of Location and Custodian of Documents.

The DEIR was previously circulated for public review from April 30, 2015 to June 15, 2015. All interested persons and organizations had an opportunity during this time to submit their written comments on the DEIR to the County of San Diego. In response to comments received from the circulation of the DEIR and recent court decisions on greenhouse gases, revisions were made to portions of the environmental analysis which contained significant new information, including sections relating to greenhouse gas emissions and land use. Due to these additions and changes made to the DEIR, the County decided to recirculate a Draft Revised EIR for the Proposed Project. Pursuant to CEQA Guidelines Section 15088.5(f)(2). The RDEIR was recirculated for a 52-day period from December 8, 2016 until January 30, 2017.

The major additions or changes associated with the RDEIR included the following:

- 1) A revised greenhouse gas analysis (November 2016) was prepared to address the November 2015 California Supreme Court ruling in the Center for Biological Diversity vs. California Department of Fish and Wildlife case (commonly referred to as the Newhall Ranch case);
- 2) The General Plan Amendment (PDS2013-GPA-13-001) included as part of the Project would be revised to also provide consistency with the County of San Diego’s General Plan Policy LU-6.3 Conservation-Oriented Project Design which promotes clustered projects utilizing specific plans. Additionally the Proposed Project is located within the San Dieguito CPA, but within two community planning subareas. Specifically, Neighborhoods 1, 2, 3 and 4 are located within the San Dieguito CPA with no subarea defined and Neighborhood 5 is located with the Elfin Forest-Harmony Grove subarea portion of the San Dieguito CPA. As part of the General Plan Amendment, Neighborhood 5 would be removed from the Elfin Forest-Harmony Grove subarea of the San Dieguito CPA so that the entire Project site would be located within the San Dieguito Community Plan with no subarea. The proposed General Plan Amendment would remove the planning inconsistency of having Neighborhood 5 governed by the Elfin Forest-Harmony Grove subarea plan, with the rest of the Proposed Project being governed by only the San Dieguito Planning Area. With this proposed General Plan Amendment, Neighborhood 5 would no longer be subject to any of the requirements set forth in the Elfin Forest-Harmony Grove subarea portion of the San Dieguito CPA. The Amendment to the General Plan would ensure consistent application of policy throughout the Proposed Project and integrated conformance with the San Dieguito Community Plan and the County of San Diego’s General Plan goals and policies.

Since circulation of the Valiano DEIR and RDEIR and associated technical reports, there have been several changes in Project description which are described below.

The site plan has been revised to eliminate the northern single-loaded street in Neighborhood 3 which included four single-family dwelling units. Please refer to Figures 1-3, 1-4a and 1-4b of the FEIR. The overall residential lot count remains at 326 due to slight re-configuration within Neighborhoods 1, 3 and 4 to accommodate the four lots. Elimination of this street resulted in reduced impacts to biological resources and reduced grading quantity. These changes were tracked through all relevant EIR text.

Firewalls and other enhanced fire safety measures have been incorporated into the Project design to eliminate the requirement for off-site revegetation clearing. These firewalls are described in Subsection 1.2.1.4 and shown on Figures 1-28 and 1-29a of the FEIR and are evaluated in the Visual Impact Analysis and Subchapters 2.1 (*Aesthetics*) and 2.9 (*Hazards and Hazardous Materials*) of the FEIR.

Based on the comment letter received from the City of Escondido dated June 15, 2015 (Letter E in the Responses to Comments) and follow-on meetings and site visits, the FEIR includes an enhanced traffic mitigation measure for Country Club Drive/Auto Parkway intersection and a Project Design Feature on Kauana Loa Drive within the City of Escondido. Specifically, at the north end of Country Club Drive south of Auto Parkway, the Project would install a five-foot wide sidewalk installed for approximately 830 feet on the west side of the street. This would connect two currently disconnected sections of sidewalk; one extending approximately 220 feet southerly of Auto Parkway, and one extending approximately 1380 feet north of the intersection of Country Club Drive and Hill Valley Drive. A six-inch curb and gutter would be located between the sidewalk and street pavement. As necessary, and focused on the area in the southern third of the improvement, some downslope grading would occur from the back of the sidewalk to existing ground. One above-ground power pole in this area would be relocated west of the sidewalk and the other three would be protected in place. On the east side of Country Club Drive, paralleling the new sidewalk segment on the other side of the road and wherever existing driveways would not interrupt the improvements, a six-inch (street-side) asphalt berm would be backed by a five-foot wide decomposed granite pathway. Project Design Features along Kauana Loa Drive, from approximately 1,500 feet east of Country Club Drive to Harmony Grove Road, include traffic calming measures such as speed and curve signage, striping, "Bott's Dots" along the centerline, two feet of additional paved width at the corner radius and radar speed signs in both directions approaching the angled curve along this segment. The City of Escondido approved the enhanced mitigation measure for Country Club Drive and the Project Design Features for Kauana Loa at the City Council meeting held on December 9, 2015 and a follow-on letter dated December 22, 2015 stated that the City of Escondido had no further outstanding issues with the Proposed Project. This letter is included in the Responses to Comments and follows the original letter from the City (Letter E, Comments E-24 through E-27). Accordingly, this impact has been reduced from significant and unmitigable in the DEIR to significant and mitigable in the FEIR since the City has agreed to the mitigation. There was no impact associated with Kauana Loa Drive; however, the Applicant agreed to install the above described Project Design Features to reduce existing safety issues along this roadway.

Based on the comment letter received from the Rincon Municipal Water District (Letter C in the Responses to Comments) and subsequent meetings, the Proposed Project will include construction of Reservoir 7 that was identified in the District's 2014 Water Master Plan as well as an associated access road. The DEIR included the future Reservoir 7 site and analyzed associated impacts in Subchapter 2.11 (*Utilities and Service Systems*); however, it was assumed the tank and access road would be built by the District. Since the tank and access road are part of the Proposed Project, potential impacts associated with construction of the tank and access road were tracked through all relevant FEIR text. This does not require recirculation of the DEIR, since potential impacts associated with the reservoir were included in the DEIR. In addition, the access road has been relocated in the FEIR to follow an existing access road and thus eliminates the potential impacts related to non-wetland Waters of the US/streambed identified in Subchapter 2.11 of the DEIR. Subchapter 2.11 has been moved to Section 3.1.8 in the FEIR.

The November 2017 Greenhouse Gas Emissions Analysis prepared for the RDEIR (Appendix J to the EIR) evaluated the potential environmental impacts associated with the Proposed Project's emissions of GHG using the "County Efficiency Metric" post the November 2015 California Supreme Court ruling in the Center for Biological Diversity vs. California Department of Fish and Wildlife case (commonly referred to as the Newhall Ranch case). Following the public review period of the Project's RDEIR, the Superior Court in *Sierra Club v. County of San Diego*, Case No. 2012-0101054/ *Golden Door Properties LLC v. County of San Diego*, Case No. 2016-0037402 (April 28, 2017) ruled that the 2016 Guidance Document and its "County Efficiency Metric" may not be used to provide the basis for CEQA review of GHG impacts for development proposals within the unincorporated County lands. As a result, a supplemental analysis (Supplement) was prepared to utilize the significance criteria in Appendix G of the CEQA Guidelines related to GHG emissions to evaluate the project's GHG emissions. The Supplement augmented the previous analysis, did not change the focus of the GHG Emissions Analysis or FEIR, or the existing Project Design Features resulting in less than significant GHG emissions, including independently committing to offsetting 100 percent of Project electrical uses through measures including on-site photovoltaic (PV; solar) panels. Finally, the Applicant has voluntarily committed to attaining net zero emissions; which further reduces the less than significant impacts identified in the DEIR and RDEIR. All of this information is included in the Supplement to the Final Greenhouse Gas Emissions Analysis (Appendix J to the EIR). The less-than-significant impact assessment identified during public circulation remains accurate.

The Septic Option Alternative analyzed in Subsection 4.7 of the DEIR was based on the assumption that "...each house could have five bedrooms and each lot could be at least five acres in size to accommodate septic systems." Pursuant to the *Final County Local Agency Management Program (LAMP) for Onsite Wastewater Treatment Systems* (County 2015b) which was issued after the Notice of Preparation was issued for the Project, this assumption has been changed to allow minimum two-acre lots (with the number of potential bedrooms per house to remain unchanged). Accordingly, the revised Septic Alternative included in Subsection 4.7 of the FEIR is based on two-acre minimum lots and up to five bedrooms per unit, with a total of 58 lots (compared to the 35 lots in the DEIR). Based on the previously described LAMP, related amendments to the San Diego County Code of Regulatory Ordinances (Division 8 of Title 6), and comments received during the EIR public review process, the Septic Option Alternative has also been expanded to include consideration of both conventional and alternative on-site wastewater

treatment system (OWTS) designs. Specifically, a conventional OWTS design includes a septic tank and a subsurface disposal system for dispersal of the septic tank effluent, and while some treatment occurs in the septic tank, the majority of the treatment occurs in the unsaturated soil below the disposal field (with associated requirements related to soil/groundwater depths, percolation rates, etc.). An alternative OWTS includes advanced (in addition to primary) treatment in the septic tank, and is typically used to overcome site-specific constraints related to high groundwater or shallow soils (with the additional septic tank treatment largely replacing treatment in the soil provided under conventional systems as noted).